

**EXHIBIT A**

**ORIGINAL**

Samuel T. Poole

V.

Stan Taylor and Raphel Williams

: Civil Action No.99-635

:

: Judge *Judge L. Robinson*

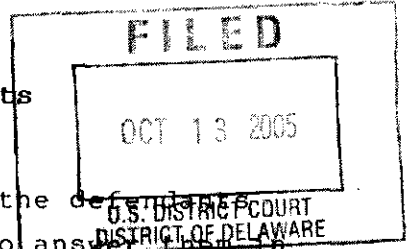
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**Interrogatories Directed to Defendants**

Plaintiff submits the following Interrogatories to the defendant. Pursuant to Rule 33, Fed.R.Civ.P., you are directed to answer them in writing under oath and within 30 days of service.

1. Was you placing Approx. 50 unsentenced inmates in the Fitness Center.(Yes)or(No).
2. Was placing inmates inside the gym on blue crates up off the floor Approx. 80.(Yes)or(No).
3. Was the only inmates you was keeping on the floor in Gander Hill on the floor just unsentenced inmates. (Yes) (No).
4. Was the amount on the floor between 300 and 450.(Yes) (No)
5. Did the Jail ever tell anybody investgating the fitness center that there was not anybody kept on the floor of thr fitness center. (Yes) (No)
6. Was there alot of inmates complaing about how cold it was on the first floor to where your body got numb. (Yes) (No)
7. Did you abuse the codes for detain 3 to a cell and place in Germ from 1000 of people sweatty inside of the fitness center (Yes) (No).
8. Did you place #50 inmates in the fitness center with two seated bathroom. (Yes) (No)
9. Did you also feed inmates in the fitness center and sit them on the floor to eat cells and in the fitness center.(Yes) (No)
10. Did the Sentanced inmates have to eat like this. (Yes) (No)
11. Was you told by any Federal or ACLU or any other agency to stop placing any inmates on the floor. (Yes) (No)
12. Was I placed where I stated in my complaint for over180 days (Yes) (No).
13. Was you keeping inmates in the cell over 24 hours and more most when the officer got payed.(Yes) (No)

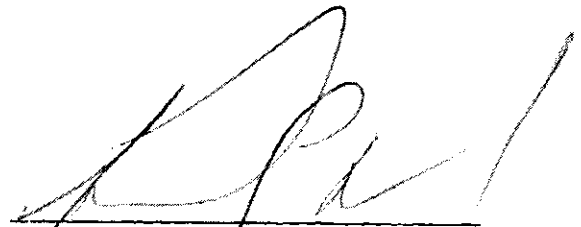


14. 48 hours in there cell. (Yes) (No)
15. 72 hours in there cell. (Yes) (No)
16. Did I get hurt on July 6, 1999. (Yes) (No)
17. Was both officers in the bubble while that closet was open.  
(Yes) (No)
18. Is it policy that a Guard must be on the tier while the closet was open. (Yes) (No)
19. Did the officer tell me to enter that closet to get the mop and broom to clean my cell, while block out. (Yes) (No)
20. I want to know during this time kept in the cell at approx. 106% while bleeding that everywhere staff was it was freezing.  
(Yes) (No)
21. Was Raphael Williams Warden of the prison and Stan Taylor Dir. of prisons of the State of Delaware. (Yes) (No)
22. Could this problem very easily been taken care of with army cots. (Yes) (No)
23. Are you suppose to provide proper housing for every inmate in Gander Hill. (Yes) (No)

105 amended. Dec 27, 1946, eff. Mar 19, 1948; Mar 30, 1970 eff. July 1, 1970; Apr. 29, 1980, eff. Aug 1, 1980; Apr. 22, 1993, eff. Dec. 1993.

10-9-01

C.C. Richard W. Hubbard,  
2 Copies

  
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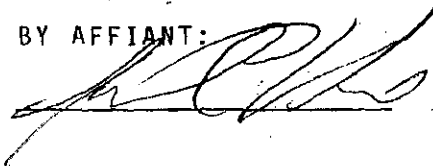
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AFFIDAVIT AND PROOF OF SERVICE

NOW COMES, Samuel T. Rouse AND AFIRMS THAT HE IS THE LITIGANT IN THE AFORE CAPTIONED AND ATTACHED MATTER, THAT THE WITHIN AVERMENTS AND FACTS IN SUPPORT THEREFORE ARE TRUE AND CORRECT TO THE BEST OF HIS PERSONAL EXPERIENCE, RECALL, KNOWLEDGE AND BELIEF, UNDER PENALTY FOR PERJURY. HE FURTHER AFFIRMS AND AVERS THAT HE HAS SERVED COPIES OF THE FOREGOING AND ATTACHED DOCUMENTS BY FIRST-CLASS MAIL TO THE PARTIES LISTED BELOW, BY HAVING PLACED THEM IN THE HANDS OF PRISON AUTHORITIES FOR MAILING, AS RULED PROPERLY AND TIMELY "FILED" BY AND IN HOUSTON vs LACK, 108 s. ct 2379, at 2383 (1988).

I CERTIFY THAT THIS DOCUMENT WAS GIVEN TO PRISON OFFICIALS, FOR THE FORWARDING TO THE SAID COURT. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. 28 U.S.C. SEC. 1746.

BY AFFIANT:



CC:

SUBSCRIBED AND SWORN TO ME

THIS 9 DAY OF 10, 2001

*Sending Motion for Discovery and Interrogatories  
To: Certified*

*2 Copies*

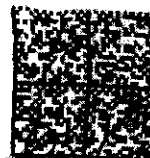
*Richard W. Hubbard  
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U.S.M.S.  
X-RAY

PA Dept of Corrections  
Inmate Mail



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